

From: ["Ken Merrill" <kmerrill@kalispeltribe.com>](mailto:kmerrill@kalispeltribe.com)  
To: ["Bray, Dave" <Bray.Dave@epa.gov>](mailto:Bray.Dave@epa.gov)  
Date: 3/8/2017 2:54:40 PM  
Subject: RE: Kalispel Class 1 Redesignation Public Notice

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OK. Thanks

Ken Merrill  
Water Resources Program  
(509) 447-7276 (office)  
(b) (6) (cell)

From: Bray, Dave [mailto:Bray.Dave@epa.gov]  
Sent: Wednesday, March 08, 2017 2:23 PM  
To: Ken Merrill  
Subject: RE: Kalispel Class 1 Redesignation Public Notice

Hi Ken.

Actually, yes, PSD increments can be impacted by emissions from prescribed silvicultural burning. After the minor source baseline date for a pollutant is triggered, all man-made emissions increases consume increment. But there is no burn-by-burn PSD increment review because prescribed burns are not major stationary sources subject to PSD permits.

While increases in prescribed burning emissions after the minor source baseline date can consume some increment, the amount of increment consumed will be minimal, primarily because fires are temporary and the location of burning is constantly changing. The only scenario where increment consumption could be an issue would be where increased prescribed burning constantly impacts the same downwind locations. We've never seen such a situation in any State, even those where burning on National Forest lands near the current Class I areas (National Parks and National Wilderness Areas) has increased.

Dave

From: Ken Merrill [mailto:kmerrill@kalispeltribe.com]  
Sent: Wednesday, March 08, 2017 2:10 PM  
To: Bray, Dave <Bray.Dave@epa.gov>  
Subject: RE: Kalispel Class 1 Redesignation Public Notice

Hi David,  
Is there any scenario where the Class 1 area designation could impact prescribed silvicultural burning? I think not but wanted some confirmation.  
Thanks --Ken

Ken Merrill  
Water Resources Program  
(509) 447-7276 (office)  
(b) (6) (cell)

From: Bray, Dave [mailto:Bray.Dave@epa.gov]  
Sent: Wednesday, March 08, 2017 12:15 PM  
To: Ken Merrill

Cc: Mckelvey, Laura; Khatibi, Mehrdad; Christopher J Lee; natalene.cummings@fcpotawatomi-nsn.gov  
Subject: RE: Kalispel Class 1 Redesignation Public Notice

Hi Ken,

Thanks for letting us know.

And as always, feel free to contact me if any questions arise as you move through the procedural steps of the reclassification process.

Dave

From: Ken Merrill [mailto:kmerrill@kalispeltribe.com]  
Sent: Wednesday, March 08, 2017 12:06 PM  
To: Bray, Dave <Bray.Dave@epa.gov>  
Cc: Mckelvey, Laura <Mckelvey.Laura@epa.gov>; Khatibi, Mehrdad <khatibi.mehrdad@epa.gov>; Christopher J Lee <Christopher.Lee@nau.edu>; natalene.cummings@fcpotawatomi-nsn.gov  
Subject: Kalispel Class 1 Redesignation Public Notice

Now out of the bag. Thanks for the training and guidance. --Ken

Kenneth R. Merrill  
Manager - Water Resources Program  
Kalispel Tribe Natural Resources  
PO Box 39, Usk, WA, 99180  
(509) 447-7276 (office)  
(b) (6) (cell)

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